

Fill in this information to identify your case:

United States Bankruptcy Court for the:

WESTERN DISTRICT OF TEXAS

Case number (if known) Chapter 7☐ Check if this an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name	<u>Central Texas Medical Specialists, PLLC</u>	
2. All other names debtor used in the last 8 years <small>Include any assumed names, trade names and doing business as names</small>	<u>DBA Austin Cancer Centers</u>	
3. Debtor's federal Employer Identification Number (EIN)	<u>46-0829574</u>	
4. Debtor's address	Principal place of business <u>9715 Burnet Road</u> <u>Building 7, Suite 200</u> <u>Austin, TX 78758</u> <small>Number, Street, City, State & ZIP Code</small> <u>Travis</u> <small>County</small>	Mailing address, if different from principal place of business <u>PO Box 82149</u> <u>Austin, TX 78708</u> <small>P.O. Box, Number, Street, City, State & ZIP Code</small> Location of principal assets, if different from principal place of business <u>SEE ATTACHED LIST</u> <small>Number, Street, City, State & ZIP Code</small>
5. Debtor's website (URL)	<u>www.AustinCancerCenters.com</u>	
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	

Debtor **Central Texas Medical Specialists, PLLC**
Name

Case number (if known)

7. Describe debtor's business A. Check one:

- ☒ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☐ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

6211**8. Under which chapter of the Bankruptcy Code is the debtor filing?** Check one:

- ☒ Chapter 7
- ☐ Chapter 9
- ☐ Chapter 11. Check **all** that apply:

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

Debtor **Central Texas Medical Specialists, PLLC**

Case number (if known)

Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?
- ☒ No
☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor

Relationship

District

When

Case number, if known

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No☐ Yes.

Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

- ☐ It needs to be physically secured or protected from the weather.

- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

- ☐ Other

Where is the property?

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No☐ Yes.

Insurance agency

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.

- ☒ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☐ 1-49☒ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

15. Estimated Assets

☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000☒ \$1,000,001 - \$10 million☐ \$500,000,001 - \$1 billion

Debtor

Central Texas Medical Specialists, PLLC

Case number (if known)

Name

☐ \$50,001 - \$100,000

☐ \$10,000,001 - \$50 million

☐ \$1,000,000,001 - \$10 billion

☐ \$100,001 - \$500,000

☐ \$50,000,001 - \$100 million

☐ \$10,000,000,001 - \$50 billion

☐ \$500,001 - \$1 million

☐ \$100,000,001 - \$500 million

☐ More than \$50 billion

Debtor

Central Texas Medical Specialists, PLLC

Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **January 3, 2024**

MM / DD / YYYY

X /s/ Reed Tinsley

Signature of authorized representative of debtor

Reed Tinsley

Printed name

Title **Interim CEO**

18. Signature of attorney

X /s/ Mark C. Taylor

Signature of attorney for debtor

Date **January 3, 2024**

MM / DD / YYYY

Mark C. Taylor

Printed name

Holland & Knight LLP

Firm name

100 Congress Ave

Suite 1800

Austin, TX 78701

Number, Street, City, State & ZIP Code

Contact phone **512-685-6400**

Email address **mark.taylor@hklaw.com**

19713225 TX

Bar number and State

ATTACHMENT TO PETITION

4. Location of Principal Assets, if different from principal place of business:

- A. 2000 Scenic Drive, Suite G002, Georgetown, TX 78626
- B. 11111 Research Blvd., Suite LL2, Austin, TX 78759
- C. 3201 S. Austin Avenue, Suite 315, Georgetown, TX 78626

WRITTEN CONSENT OF THE WIND UP SUPERVISOR

December 27, 2023

Pursuant to Orders (the “Orders”) dated April 23, 2023 and May 17, 2023, entered in Cause No. D-1-GN-22-006668, in the 455th District Court, Travis County, Texas, in the action styled “Central Texas Medical Specialists, PLLC v. Dr. Stephen Brown, et al.,” Patrick Keel (“Keel”) was appointed as Wind Up Supervisor for Central Texas Medical Specialists, PLLC (the “Company”) pursuant to the Texas Business Organizations Code, and also appointed as substitute Receiver for the Company.

Pursuant to the Orders, Keel was given full authority to, among other things, wind up the Company and hire professionals.

Having considered the liabilities and liquidity situation of the Company, and the strategic alternatives available to the Company, Keel has determined that there is no ongoing business of the Company, it is suffering continuing losses and cannot sustain operations, and its creditors and will best be served by the Company’s filing of a voluntary petition under Chapter 7 of the United States Bankruptcy Code.

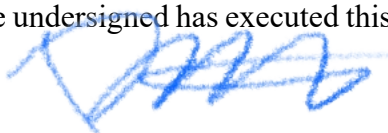
Accordingly, Keel hereby authorizes and directs the filing of a petition under Chapter 7 of Title 11 of the United States Code by the Company,

Reed Tinsley, Interim CEO, is authorized and directed, for and on behalf of the Company, to execute and verify the Petition, and any amendments thereto, in the name of the Company under Chapter 7 of the Bankruptcy Code and cause the same to be filed in the United States Bankruptcy Court for the Western District of Texas, and is hereby authorized to execute, verify, and/or file or cause to be filed (or direct others to do so on their behalf), all documents including, without limitation, petitions, schedules, lists, affidavits, motions, pleadings, and other papers, and to take any and all action which they deem necessary or proper in connection with such proceedings under Chapter 7, and to take such actions as may be necessary in the case; and it is further

Keel has previously retained and employed Holland & Knight LLP (the “*Firm*”) as bankruptcy counsel.

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IN WITNESS WHEREOF, the undersigned has executed this consent, effective as of the date first written above.



Name: Patrick Keel, Wind Up Supervisor

**United States Bankruptcy Court
Western District of Texas**

In re **Central Texas Medical Specialists, PLLC**

Debtor(s)

Case No.

Chapter

7

VERIFICATION OF CREDITOR MATRIX

I, the Interim CEO of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **January 3, 2024**

/s/ Reed Tinsley

Reed Tinsley/Interim CEO

Signer/Title

ACC Lakeway Tenant, LLC
PO Box 82149
Austin, TX 78708

ASD Specialty Healthcare (Ion Solutions)
3101 Gaylord Parkway
Frisco, TX 75034

ASD Specialty Healthcare (Oncology Suppl
2801 Horace Shepard Dr
Dothan, AL 36303-1038

Asset Protection Unit (APU)
PO BOX 30969
Amarillo, TX 79120

AT&T
PO BOX 5019
Carol Stream, IL 60197-5019

Austin Cancer Center III, Ltd.
PO Box 82149
Austin, TX 78708

Austin Cancer Center IV, Ltd.
PO Box 82149
Austin, TX 78708

Austin Cancer Center V, Ltd.
PO Box 82149
Austin, TX 78708

Austin Cancer Center VI, Ltd.
PO Box 82149
Austin, TX 78708

Austin Cancer Center VII, Ltd.
PO Box 82149
Austin, TX 78708

Avante Health Solutions
1040 Derita Road
Suite A
Concord, NC 28027

Beckman Coulter, Inc.
PO BOX 8000
250 South Kraemer Blvd
Brea, CA 92822-8000

Becton, Dickinson & Company
21588 Network Place
Chicago, IL 60673-1215

Change Healthcare
5995 Windward Parkway
Suite 500
Alpharetta, GA 30005

Cooper Commercial
4400 West Hwy 29
Georgetown, TX 78628

Dunn Smith Stone LLP
Attn: Brian T. Smith
811 Barton Springs Road
Suite 725
Austin, TX 78704

Eide Bailly
5929 Fashion Point Dr
Suite 300
Ogden, UT 84403

Elekta, Inc.
400 Perimeter Center Terrace
Suite 50
Atlanta, GA 30346

GE Precision Healthcare LLC
12854 Kenan Drive
Suite 201
Jacksonville, FL 32258

Grande Communications Network LLC
401 Carlson Circle
San Marcos, TX 78666

Healthcare Realty
PO BOX 561549
Denver, CO 80256-1549

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Lexis Nexis
9443 Springboro Pike
Miamisburg, OH 45342

Linde Gas & Equipment
PO BOX 120812
Dept 0812
Dallas, TX 75312-0812

McGinnis Lochridge
Attn: Jordan Mullins & Edward McHorse
1111 W. 6th St.
Bldg. B, Ste. 400
Austin, TX 78703

McKesson Medical-Surgical, Inc.
9954 Mayland Drive
Suite 4000
Henrico, VA 23233

McKesson Merchant Processing
PO BOX 100884
Atlanta, GA 30384

McKesson Specialty Care Dist, LLC
401 Mason Road
La Vergne, TN 37086

NextGen Healthcare
18111 Von Karman Ave
Suite 600
Irvine, CA 92612

Nuance Communications, Inc.
1 Waysite Road
Burlington, MA 01803

Office Depot Solutions
PO BOX 660113
Dallas, TX 75266

Palette Life Sciences, Inc.
27 E Cota Street
Suite 402
Santa Barbara, CA 93101

Philips Healthcare
PO BOX 100355
Atlanta, GA 30384-0355

Pitney Bowes Global Financial
PO BOX 981039
Boston, MA 02298

Prince Parker & Associates
PO BOX 474690
Charlotte, NC 28247

Shred-It USA LLC
28883 Network Place
Chicago, IL 60673-1288

Siemens Medical Solutions USA, LLC
221 Gregson Dr
Cary, NC 27511

Stericycle, Inc.
28883 Network Place
Chicago, IL 60673-1288

Sun Nuclear Corporation
3275 Suntree Blvd
Melborne, FL 32940

Terrazas PLLC
1001 S Capital of Texas Hwy
Building L Suite 250
Austin, TX 78746

Texas Cancer Institute, PLLC
11111 Research Blvd., LL2
Austin, TX 78759

Texas Comptroller of Public Accounts
Revenue Accounting Division
Bankruptcy Section
PO Box 13528 Capitol Station
Austin, TX 78711

Texas Medical Board
Attn: Nancy Leshikar, General Counsel
333 Guadalupe
Tower 3, Suite 610
Austin, TX 78701

Texas Medical Liability Trust
901 Mopac Expressway South
Barton Oaks Plaza V, Suite 500
Austin, TX 78746-5942

TopRX LLC
2950 Brother Blvd
Suite 101
Bartlett, TN 38133

Travis County Attorney's Office
Attn: County Attorney
PO Box 1748
Austin, TX 78767

Travis County Tax Assessor
PO BOX 149328
Austin, TX 78714-9328

United Medical Solutions, Inc.
PO BOX 34990
San Antonio, TX 78265

US Trustee
903 San Jacinto, Suite 230
Austin, TX 78701

USI Southwest, Inc.
4630 North Loop 1604 West
Suite 410
San Antonio, TX 78249

UT MD Anderson Cancer Center
PO BOX 4266
Houston, TX 77210-4266

VWR
PO BOX 117
Wayne, PA 19087

Williamson County Tax Assessor
904 South Main
Georgetown, TX 78626

ZTrip - WHC ATX, LLC
10630 Joseph Clayton Dr
Building A
Austin, TX 78753

**United States Bankruptcy Court
Western District of Texas**

In re **Central Texas Medical Specialists, PLLC**

Debtor(s)

Case No.

Chapter

7

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Central Texas Medical Specialists, PLLC** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [*Check if applicable*]

January 3, 2024

Date

/s/ Mark C. Taylor

Mark C. Taylor

Signature of Attorney or Litigant

Counsel for **Central Texas Medical Specialists, PLLC**

Holland & Knight LLP

100 Congress Ave

Suite 1800

Austin, TX 78701

512-685-6400 Fax:512-685-6417

mark.taylor@hklaw.com